

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:21-cv-0137-FL

360 VIRTUAL DRONE SERVICES )  
LLC and MICHAEL JONES, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
ANDREW L. RITTER, in his official )  
capacity as Executive Director of the )  
North Carolina Board of Examiners for )  
Engineers and Surveyors; and JOHN )  
M. LOGSDON, JONATHAN S. CARE, )  
DENNIS K. HOYLE, RICHARD M. )  
BENTON, CARL M. ELLINGTON, JR, )  
CEDRIC D. FAIRBANKS, BRENDA L. )  
MOORE, CAROL SALLOUM, and )  
ANDREW G. ZOUTWELLE, in their )  
official capacities as members of the )  
North Carolina Board of Examiners for )  
Engineers and Surveyors, )  
 )  
Defendants. )

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

NOW COME Defendants, by and through counsel and pursuant to Rules 56 and 12(b)(1) of the Federal Rules of Civil Procedure, and hereby move the Court for summary judgment dismissing the Complaint filed by Plaintiffs with prejudice because there is no genuine issue of material fact and Defendants are entitled to judgment as a matter of law. In support thereof, Defendants are filing an accompanying memorandum contemporaneously herewith.

Respectfully submitted this the 25<sup>th</sup> day of March, 2022.

FITZGERALD HANNA & SULLIVAN, PLLC

/s/ Douglas W. Hanna

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the foregoing DEFENDANTS' MOTION FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

David G. Guidry, Mainsail Lawyers, [dguidry@mainsaillawyers.com](mailto:dguidry@mainsaillawyers.com)

Samuel B. Gedge, Institute for Justice, [sgedge@ij.org](mailto:sgedge@ij.org)

James T. Knight II, Institute for Justice, [jknight@ij.org](mailto:jknight@ij.org)

This the 25<sup>th</sup> day of March, 2022.

/s/ Douglas W. Hanna  
Douglas W. Hanna, NCSB #18225